



# Telecommunications Law Professionals PLLC

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August 28, 2019

## VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: GCI Communication Corp.  
Notice of Ex Parte Communication – *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*  
GN Docket No. 18-122

Dear Ms. Dortch:

On August 26, 2019, Kara Azocar, Regulatory Counsel, Federal Affairs, of GCI Communication Corp. (“GCI”), along with Jessica Gyllstrom of Telecommunications Law Professionals PLLC, met separately with (1) Erin McGrath, the Wireless, Public Safety and International Legal Advisor to Commissioner O’Rielly; (2) Umair Javed, the Wireless and International Legal Advisor to Commissioner Rosenworcel; and (3) Aaron Goldberger, Wireless and International Advisor, and Victoria Randazzo, Intern, to Chairman Pai. GCI’s presentations during the meetings were consistent with its previous statements on the record in this docket and in related proceedings.

Specifically, GCI provided background on its significant reliance on the C-Band due to the unique attributes of Alaska, including Alaska’s harsh weather, unique topography and federal land regulation. GCI explained that it uses the C-Band to provide a variety of critical services, including video programming and broadband services in rural and remote areas; long-distance and emergency communications; real-time information transmissions to the FAA; and distance-learning and telehealth services. GCI urged the FCC to recognize the unique role that the C-Band plays in Alaskan communications by excluding the State of Alaska from any future reallocation of the C-Band and incorporating the following protections for incumbent C-Band operations: (1) commitments from satellite operators and MVPD programmers each to maintain the status quo of Alaskan C-Band operations (i.e., access to the full 500 MHz of C-Band capacity and receipt of video programming via C-Band); (2) maintaining the full-band, full-arc coordination policy; and (3) reimbursement to Alaska earth station operators for any impacts to their operations as a result of the reallocation of the C-Band services, regardless of whether that occurs exclusively in the Lower 48.



Ms. Marlene H. Dortch  
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Please direct any questions to the undersigned.

Sincerely,

/s/Jessica D. Gyllstrom

Jessica DeSimone Gyllstrom  
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

*Enclosure*

cc (via email):      Erin McGrath  
                             Umair Javed  
                             Aaron Goldberger  
                             Victoria Randazzo

